

September 16, 2003

Mr. Robert Moore Office of Nutritional Products, Labeling & Dietary Supplements, HFS 811 Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

7242 103 77.16.02:364

RE:

Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Calcium	Vitamin D, Calcium (from tricalcium phosphate and calcium citrate), Phosphorus, Magnesium, Sodium	PhytoPharmica Calcium supplies the right mix of calcium and phosphorous.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/16/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Chief Financial Officer

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920-469-9099 TOLL FREE 800-553-2370 FAX 920-469-4418

FAX TOLL FREE 888-311-5657 WWW.PHYTOPHARMICA.COM

Calcium 2p